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**MEMO ENDORSED**

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January 11, 2021

**VIA ECF**

The Honorable Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 17D  
New York, NY 10007

**An additional 90-Day Stay of Discovery is hereby Granted. The parties' shall file a joint status letter with the court by April 23, 2021. The telephonic Initial Case Management Conference scheduled for Thursday, January 21, 2021 at 10:00 a.m. is hereby rescheduled to Wednesday, April 28, 2021 at 11:00 a.m. Counsel for the parties are directed to call Judge Parker's court conference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267.**

**SO ORDERED:**

*Katharine H. Parker*  
HON. KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE

01/11/2021

**Re: *Hines v. C.R. Bard, et al.*, Case No. 1:20-cv-07197-PGG-KHP**  
**Joint Letter Request for Additional Temporary Stay and Adjournment of Initial**  
**Case Management Conference Pending Settlement**

Dear Judge Parker:

We are counsel to defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively, "Bard"). We write jointly with counsel for plaintiff Saladeem Hines to request an adjournment of the initial case management conference scheduled for January 21, 2021, and an additional 90-day stay of all proceedings. We respectfully refer the Court to our letter dated October 19, 2020, for the background for of our request.

Presently, the parties are continuing their ongoing negotiations toward resolving the case. Indeed, since October, the parties have settled the majority of the approximate 575 Bard filter cases handled by Mr. Hines's attorneys. Accordingly, the parties respectfully request the Court enter a stay of all activities for an additional 90 days and adjourn the conference on January 21, 2021. In the event the parties reach settlement during this period, we will immediately advise the Court.

Counsel for the parties are available at the Court's convenience should the Court wish to address these issues more specifically.

Respectfully submitted,

/s/ *Marissa Banez*

Marissa Banez

cc: Eric Martin Przybysz, Esq. (via ECF)  
Steven Scott Schulte, Esq. (via ECF)  
Darren McDowell, Esq. (via ECF)  
*Counsel for Plaintiff Saladeem Hine*